

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

In the Matter of	)	
	)	
BridgeWave Communications Inc. Request for	)	WT Docket No. 11-25
Waiver to Aggregate Contiguous Channels Over a	)	
Single Carrier in the 18 GHz Band	)	

To: Chief, Wireless Telecommunications Bureau

**COMMENTS OF BRIDGEWAVE COMMUNICATIONS INC.**

BridgeWave Communications Inc. (“BridgeWave”), by its counsel and in response to the Commission’s Public Notice released March 1, 2011 (DA 11-401), hereby submits its comments in the above-referenced proceeding.

BridgeWave continues to have a direct and immediate interest in Commission approval of its waiver request (“Request”).<sup>1</sup> As discussed therein, BridgeWave is asking the Commission to issue a limited waiver of Section 101.147(r) of its rules to afford users of BridgeWave’s 18 GHz radios channel aggregation rights comparable to those already afforded to backhaul providers operating in the 24 and 39 GHz bands.<sup>2</sup> Once approved, the waiver will permit BridgeWave to aggregate three 50 MHz channels in the 18 GHz band into a single 150 MHz channel capable of transmitting multi-gigabit backhaul links over distances up to five times as long as those achievable in millimeter wave spectrum, without causing interference to other 18 GHz users. This type of solution advances the National Broadband Plan’s goal of promoting

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<sup>1</sup> BridgeWave Communications Inc. Request for Waiver to Permit Channel Aggregation by Non-MVPD Users of the 18 GHz Band, WT Docket No. 11-25 (filed May 12, 2011).

<sup>2</sup> *Id.* at 1.

new near-term wireless backhaul solutions capable of handling the accelerating demand for 4G wireless services.<sup>3</sup>

WHEREFORE, for the reasons already set forth in the record, BridgeWave Communications Inc. requests that the Commission issue a limited waiver of Section 101.147(r) of its rules to permit users of BridgeWave's 18 GHz radios to aggregate contiguous channels over a single carrier.

Respectfully submitted,

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March 15, 2011

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<sup>3</sup> *Id.* at 2-4. *See also* Amendment of Part 101 of the Commission's Rules to Facilitate the Use of Microwave for Wireless Backhaul and Other Uses and to Provide Additional Flexibility to Broadcast Auxiliary Service and Operational Fixed Microwave Licensees, *Notice of Proposed Rulemaking and Notice of Inquiry*, 25 FCC Rcd 11246, 11247-8 (2010) ("[B]ackhaul costs currently constitute a significant portion of a mobile wireless operator's network operating expense, and the demand for backhaul capacity is increasing. Cost-efficient access to adequate backhaul thus will be a key factor in promoting robust competition in the wireless marketplace. . . . By enabling more flexible and cost-effective microwave services, the Commission can help increase deployment of fourth-generation (4G) mobile broadband networks across America.").